



COMMONWEALTH OF MASSACHUSETTS  
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS  
**DEPARTMENT OF ENVIRONMENTAL PROTECTION**  
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Commissioner

August 4, 2006

George Drew  
Environmental Compliance Specialist  
Covanta Haverhill, Inc.  
100 Recovery Way  
Haverhill, MA 01834

Dear Mr. Drew:

Thank you for the prompt filing of your Material Separation Plan 4 ("MSP4"). The Massachusetts Department of Environmental Protection ("MassDEP") has reviewed the MSP4 and has comments of a general nature that apply to all three municipal waste combustor operators in addition to comments specific to the Covanta Plan.

General Comments:

1. As discussed at our meeting in March, MassDEP intends to actively promote MSP4 services by conducting direct outreach to schools, businesses and health care facilities in your contract communities encouraging them to avail themselves of the services offered.

Comments on Covanta's Plan:

Prior to approval of the MSP4, MassDEP requests the following additional information or changes to Covanta's MSP4:

1. Part C - Mercury product Collection Events: As noted in your 2005 Annual Report and the MSP4 draft, this "type of event had limited participation yet high costs." MassDEP believes these collection events can be discontinued and program emphasis should be placed on creating permanent collection opportunities including commercial and municipal sites. Covanta may also want to consider working with Boards of Health to incorporate proper handling of mercury products into the Board's permitting process. This permitting model has been successful elsewhere in the Commonwealth including the towns of Burlington, Granby and South Hadley.
2. Part H - Health Care Facility Mercury Clean Outs: This section is narrowly focused on "small health care facilities" and commits to only three clean outs per year. According to our records there are only four community healthy centers in your contract communities

and they have already exchanged their mercury sphygmomanometers, thereby making this goal unattainable. We suggest broadening the definition of the facilities and generators to hospitals, physician offices, nursing homes, etc. and clarifying how you plan to conduct outreach for this sector.

3. Administrative costs: Just over 52% of the budget is earmarked for direct mercury recovery activities with the balance being spent on administration and overhead. As requested in our letter to you dated April 7, 2006, MassDEP would like to see more funds utilized for direct mercury recovery activities. Please provide details on the administrative costs to justify such a large allocation of resources.
4. Service Area Definition: As discussed at our meeting in March, the MSP Guidance document very broadly defines Service Area. We talked about having varying service levels for different tiers of generators with Contract Communities having access to all services. Please provide a definition of other service areas that will be covered by the Plan, as resources allow.
5. Document formatting/cleanup: The Table of Contents seems to reflect MSP III activities, not MSP IV activities.

I look forward to receiving your revised MSP4 by August 25, 2006.

Sincerely,

Nancy L. Seidman, Division Director  
Consumer and Transportation Programs  
Bureau of Waste Prevention

cc: James Lynch, Facility Manager  
Ted Hoefler, Regional Vice President  
Daniel Harty, MSP Coordinator  
James C. Colman, MassDEP  
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